

**Ordering and Billing Forum
Issue Identification Form**

World Com Cross Ex. 7
Amer Witness Kagan
Disputed Issue #73(B)
October 2, 2000

OBF Issue Number	1287
Date Submitted:	8/19/96
Date Accepted:	8/26/96 at OBF #55
Initial Closure	02/03/98 at OBF #61
Final Closure	08/25/98 at OBF #63
Issue Category	RESOLVED

Part A, Page 1

Issue: Billing for Unbundled Network Elements

The billable components of Unbundled Network elements need to be defined and established for both paper and mechanized bills. (Can be billed via MOU or flat rated.)

Impact of Other Issues or Procedures: At OBF #59 consensus was reached to combine Issue Number 1286 - Billing for Unbundled Switching Elements with this issue. As of OBF #59 the complete status history of Issue 1286 is included in issue 1287.

Desired Results: To establish a method in which the Unbundled Network Elements can be displayed and defined on both paper and mechanized bills.

OFFICIAL FILE

I.C.C. DOCKET NO. 00-0592

Committee Assignment: Billing

W.C. Cross Exhibit No. 7

Associated Committee:

Witness Kagan / Issue 73(b)
Date 10/3/00 Reporter KM

Issue Champion: Beverly Hutcherson Company: AT&T

Address:

Telephone:

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Part A, Page 1

Issue: Billing for Unbundled Network Elements

Resolution:

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Part B, Page 1 (Status History)

Issue: Billing for Unbundled Network Elements

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OBF #55 (August 26, 1996)

Issue Introduction and Acceptance

During discussion of the Unbundled Switching Elements, it was recognized that Unbundled Network Elements were also a part of the FCC Order. So as not to further complicate issue #1286, the Committee agreed that a new issue should be opened to address the unbundled network elements. Beverly Hutcherson (AT&T) agreed to be the champion.

The issue was accepted and assigned #1287. Unlike issue 1286, however, this issue was not accepted under the expedited process. Therefore, **discussion will begin at OBF #56.**

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Part B, Page 2
(Status History)

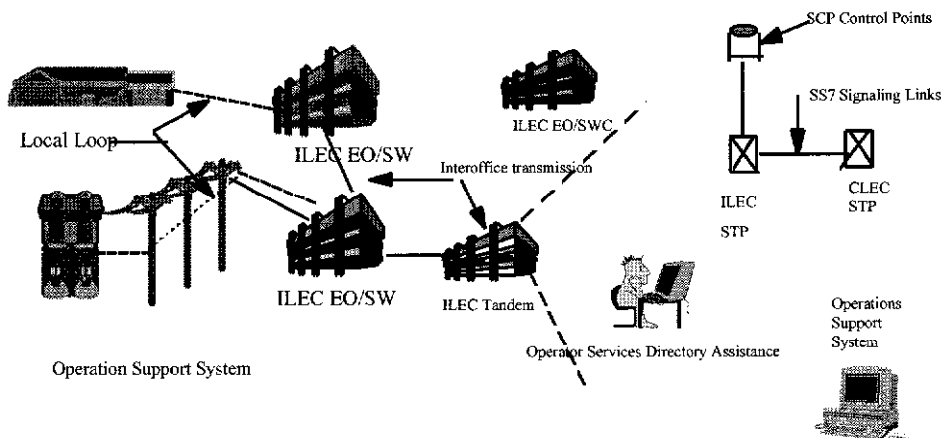
Issue: Billing for Unbundled Network Elements

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(OBF #56, October 21, 1996)

Prior to the beginning of this discussion, Mitch Wright stated, for the record, that any comment he may make regarding this issue was in his capacity as a facilitator (co-leader) and not as a U S WEST representative.

Beverly Hutcherson (Issue Originator) reminded the Committee that this issue was created based on the discussion of Issue 1286. Ms. Hutcherson presented the following diagram to kick off the discussion:



In conjunction with this diagram, Ms. Hutcherson also presented what she believed to be the "FCC's minimum list of unbundled elements": This included:

1. Local Loops
2. Switching (All features of the switch) [Local Switching and Tandem Switching]
3. Interoffice Transmission
4. Call-Related Databases/SS7/Service Management Systems
5. Operations Support Systems
6. Operator Services and DA
7. Network Interface Devices (NID to NID Connection)

Committee representatives believed that element 2 would be addressed as part of Issue 1286, and should not be part of the issue discussion. Ms. Hutcherson agreed.

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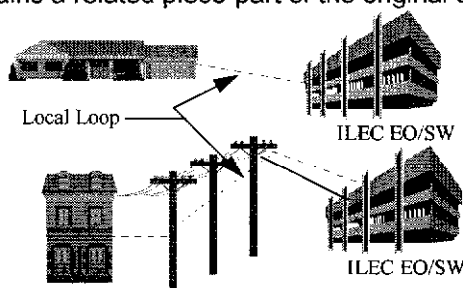
Part B, Page 3 (Status History)

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OBF #56 (October 21, 1996) (Continued)

Ms. Hutcherson suggested that the Committee address each item, identify the questions/concerns, and develop a list of homework items. The Committee agreed. The following documents the results of this effort. To facilitate the discussion, each component also contains a related piece-part of the original diagram.



1. Unbundled Local Loops

Defined as the connection from an end office switch to the Network Interface Device (assume at the customer premise). [Strictly the connection, does not include dial tone, or any associated switching elements.]

The loop needs to be compatible with the features of the port.

The loop needs to be uniquely identified as an unbundled local loop, separate from issue 1202 (local loops with co-location.)

Anticipate an equivalent account structure to Issue 1202.

Homework Questions

1. How will the unique identification of the unbundled loops be accomplished, e.g., by:

- unique USOCs/Class of Service
- Separate Indicator(s)
- Access Type
- Facility Type
- Unique Accounts
- something other than the above

Assume this unique Identifier will carry through to all sections of the bill & CSR that have separate breakouts today.

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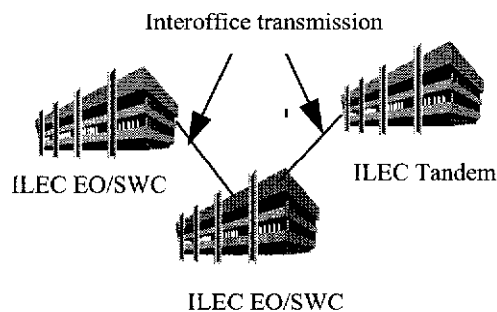
Part B, Page 4 (Status History)

Issue: Billing for Unbundled Network Elements

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OBF #56 (October 21, 1996) (Continued)

- Investigate the difference between ordering unbundled loops from co-located loops. (Check with TOR and O&P counterparts.)



2. Interoffice Transmission

The unbundled transmission between switching offices, tandems, and/or serving wire centers (as demonstrated in the above diagram).

Need to uniquely identify interoffice transmission charges.

Homework

- Determine if the rate elements/charges would be similar to local transport facility and termination or the specials flat rated direct trunked transport.
- Verify how this is ordered.
- What type of traffic can be carried (switched vs. special) [i.e. is this the beginning of the end of switched vs. special]
- How will the unique identity of unbundled interoffice transmission be accomplished?
 - Unique USOCs/Class of Service
 - Separate Indicators
 - Unique Accounts
 - Unique charge categories and/or charge types (usage sensitive)
 - Examples of unbundled transport and today's LTR/Non LTR transport on the same account.
 - Something other than the above

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OBF #56 (October 21, 1996) (Continued)

Operation Support System



Oper & DA



4. Operation Support System*

*Note: OSS reference: 96-325, para. 517

5. Operator Svcs/DA

Are there any billable elements for these services? If so, what are they?

If different products are involved within OSS and Operator Services DA, define them



Customer Premise

Network Interconnect Device

6. Network Interface Device

The cross connect device used to connect loop facilities to inside wiring at the end user's premise.*

*Note: Centel of Illinois tariff definition.

Homework Questions

Do companies agree with this definition? If not, how does your company define NID?

What is the billable element for this device?

What are the billable elements of a NID?

Feedback on the homework is to be provided on a conference call scheduled for January 14, 1997.

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Part B, Page 6 (Status History)

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Conference Call (January 14, 1997)

Issue Introduction and Acceptance

Rodney Sampson asked for feedback from the homework items assigned during OBF #56. He began with the first element, i.e., **Unbundled Loops**. In regard to the identification of the unbundled loops:

- SWBT and Pacific Bell representatives reported they would use unique USOCs and Class of Service
- NYNEX, GTE, and S.N.E.T. indicated they did not know at this time.

Additional Discussion

When questioned several provider representatives believed that the use of unique USOCs and Class of Service would be the way they would identify these charges. In addition, the charges would be presented on a separate bill (using a unique BAN). One representative indicated that there would be a field on the order (LSR/LSOG) for this information. She believed that as a result of this issue (TOR/1329), there would be a distinction made for unbundled vs. co-located loops. This would be communicated via unique values in the RECTYPE field. RECTYPE is a required field on the ASR/ASR.

In regard to the second element, **Interoffice Transmission**, some representatives believed that the rate elements/charges would be similar to the trunk side (common transport would be usage sensitive; direct transport would be flat rated). There could also be an additional cross-connect to the colocator. One representative advised that there is an issue before the O&P committee to accommodate ordering.

As far as allowable traffic for Interoffice Transmission, some representative view this to be related to special (facility) access [a facility access line could carry, for example, switched and voice grade service, similar to current shared facility arrangements]. Another representative believed the approach would vary and would depend on the structure, others believed it would be determined by their tariffs.

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Conference Call (January 14, 1997)

Additional Discussion (con't.)

Several provider representatives believed that the charges for Interoffice Transmission would be accomplished via unique USOCs/Class of Service and a unique BAN.

One representative questioned if the interoffice transmission facilities would be limited to local. A SWBT representative responded that while there could be a mixture of traffic (e.g., switched and special), they believed the traffic would be limited to local. The Pacific Bell representative indicated they were making the same assumption. However, one representative observed that because of super trunks, mixed use, and other issues, this may not be the case.

After further discussion, Mr. Sampson conducted a brief recap of the discussion. He also suggested that representatives do more research on local loops (e.g., figure out the specific display requirements [beyond unique USOCs]).

Discussion will continue at OBF #57

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Part B, Page 8 (Status History)

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OBF #57 (February 5, 1997)

The committee agreed that scenarios developed for issue 1286 will be used as a basis for discussion of this issue.-

Discussion will continue at OBF 58.

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OBF #58 (April 22, 1997)

Discussion focused on identifying Network and Switching Elements.

Example 8: Facilities-based provider CLEC term call to ULEC

- Omit "CLEC C orig & ILEC Term" from call scenarios.

Need new 9a = Intrastate/IntraLATA Calls

Originating Charges:

- 1) Flat-rated Port charge
- 2) Usage-sensitive Port charge
- 3) Switching charge
- 8) Common Transport charges
- 10) Tandem Switching
- 12) Shared Trunk Port
- 13) Call Setup Charge

LTR

(3),(12), (13)

Originating charge types 3, 12, 13 apply for ltr compliant companies

Non-LTR

It was noted that there are up to 52 different perceptions of what Unbundled is meant to be because there are 52 PUC/PSCs.

A proposal was made to combine Issues #1286 and #1287. One company voiced an objection to merging the issues. They have different issues with Unbundled Network Elements and Unbundled Local Switches. The group agreed to merge issues, but will identify those issues unique to either issue.

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OBF #58 (April 22, 1997)

MPB scenario.

- Detail of Usage Charges page; Mr. Barone went through the details of this page, explaining the logic behind each of the elements. TREI = Transport Rate Element Indicator. Worldcom asked why InterLATA Toll would appear on a Local Bill. NYNEX buckets some true InterLATA toll on the local jurisdiction. A lot of the scenarios include common transport. Originating & Term IXC toll would appear on these bills.
- Tandem page - no changes
- Transient - charges purely affiliated with calls originating from the CLEC POP. Will there be multiple rate plans for this? No, NYNEX will have time of day sensitivity, but not the multitude of calling plans. Do the bills need to be broken down like this? Do we need a break out between day, night, initial and subsequent minutes. On residential bills, there is no breakout on elements. By the time we break out the individual elements that make up a bill, the structure of the billing will be significantly more complex. IXC position is that because NYNEX access charges are day, evening and night, they need to see that type of detail. No changes to page. From the NYNEX perspective, charges are being shifted from the IXC to the ULEC, correct? For NYNEX, this is a true statement. NYNEX classifies calls as local, InterLATA toll or IXC Access as local. Will other companies have the same logic? Not necessarily, depending on how their tariffs are filed. Trunk port billed to the unbundler or the IXC? Unbundler. The trunk port bill will be jurisdiction 4 or 5. No changes.
- End Office Page - 3 End Office Charges; access local switching, unbundled local switching and shared trunk port. NYNEX will access local switching to the customer on the terminating side for a local toll call. InterSwitch and IntraSwitch rates apply or originating and terminating traffic, also apply for terminating 800. No changes.
- Carrier Common Line - Billing carrier common line when calls terminate to NYNEX end user for Jurisdiction 5 (local InterLATA toll).
- Miscellaneous Charges - This section contains 800 dips, reciprocal time charges, composite access charges (Arthur Barone will provide explanation at OBF #59), Class Features (e.g., Phone Smart), Incollects, Packet Switched Data (port type usage, etc.), Information Provider. Does the committee feel the need to have different types of accounts for information providers, or can they be put on this bill? Consensus was reached that they should be on this bill.
- Local Service Page. Operator, directory Assistance, Call Completion Messages, Services - Mass Announcement, Busy Line Verification, Call Interrupt, 0+/Mechanized Operator Calls, Calling Card.

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OBF #58 (April 22, 1997)

- Factored and some Non-factored charges on page. In NYNEX, if CLEC provides loop but buys the ports from NYNEX would this still be unbundled? Yes. Whether a CLEC buys one or all of the pieces from NYNEX, would it be a type "J". Yes. If a call were returned as unbillable or uncollectable, would they show netted in here as a credit or would they show in another category? NYNEX representative was unsure. DA calls shown would be local DA. Four types of local bills could be rendered by NYNEX; Unbundled Trunk Port, Unbundled Line Port, Resale and CLEC. The IOF has all facilities that are trunk related, plus Unbundled LIDB, Unbundled SS7, LNP.
- The rest of the package contains summary pages. Will the framework of that bill work for the other scenarios discussed (e.g., those companies that will bill unbundled pieces to the ULEC and all access to the IXC)? Yes
- Still have a question "is there a way for a ULEC that purchases some products from Company A and some from Company B to tie them together?" We really don't know enough yet to answer. There has to be something on the order that identifies the piece parts as usage sensitive or flat rated. There would need to be something on the CSR that is a file guide indicator.
- Unbundled Services could be separate account or separate bill types. When a company buys DS1 from Co A and DS3 from Co B, they can use CKR to tie things together. Is there a similar provision on the line side order? This would work for the circuits, but not the usage.
- If order at TN level will receive billing for ports and switching for that port on that bill.
- Can order local unbundled switching without ordering port? Most companies said no, but some undecided (**homework item**)
- If only local switching was ordered, what would be shown on CSR? For those companies having a usage-sensitive port charge rather than flat rated port charges, where will that be identified? There *might* be a USOC associated with the switching, but that USOC may or may not have charges associated with it. When you purchase local switching, that only gets you the switch. You cannot get out of the switch without purchasing the interoffice facilities to get out.
- The next step is to determine how an ILEC knows that on a toll call the various piece parts are provided by an ILEC or by a ULEC? That depends on negotiations, which will determine what comes in on the recordings, so everyone will probably do it differently. Switch capabilities could also impact this decision.

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OBF #58 (April 22, 1997)

- While there is only 1 real option today, with UNE there are multiple options for routing (common vs. Direct transport).

Billing Elements Discussion

Discussion based on list of 22 elements

- Local Loop - Flat or Usage? Flat-rated on the Facilities Bill most likely, but this could be changed by the state PUCs, who could dictate that these have usage-sensitive charges. Would probably have a CKTID associated.
- NID - Most companies will charge monthly recurring charges (flat-rated). Whoever provides the service (local loop) will probably provide the NID. If a CLEC migrates a customer, do they get the loop and the NID? There is no NID today, because it is considered to be part of the loop. The CLEC would need to replace the ILEC protector with a NID. NIDs can be individually ordered and purchased from the ILEC. If CLEC wins a customer already having a NID in place, will the CSR indicate that the NID already exists? Believe the answer to be yes. Consensus is that NIDs will likely be available for single and multiline services and that they would have unique USOCs. Some companies will have Monthly and NRC for NIDs, others will only have NRCs. If a ULEC orders NIDs, they only get NIDs, no loop, ports or switching. If the ULEC orders Unbundled Loop, NID and Port, they would still need Unbundled Switch Ports in order to access the network. (A handout was provided of the "NID: Network Interface Device" presentation by Ann Lopez, Product Manager for Pacific Bell at OBF #58).
- When dealing with Local Access, we have the same problem as with Interexchange Access; need to identify what pieces are flat-rated and which are usage-sensitive. In access, have CCLC that includes Port out to the NID. With unbundled, how do we know when to apply CCLC? The owner of the Port charges the CCLC.

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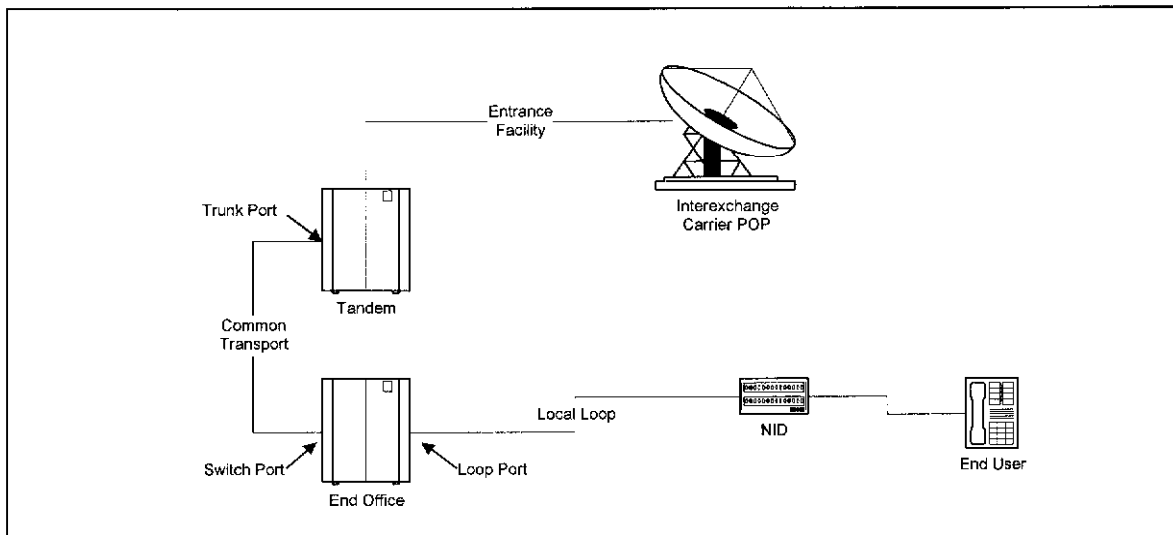
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- Element discussion based on boarded drawing:



The group discussed the various permutations that can exist in this scenario.

- When Unbundled Local Switching is ordered, it is probably ordered for a specific TN. But some are saying that you could order capacity by itself. When in ordering Tandem Switching, it is ordered for a specific trunk group. When a CLEC orders Unbundled Tandem Switching, they will be ordering that Tandem Switching for Trunks that they have ordered as Unbundled. They won't be doing Tandem Switching for the ILEC's trunks. When ordering Unbundled Tandem Switching, is it for the Entrance Facility or the Common Transport Facilities? SNET will provide customized Unbundled Switching configurations for ULECs. The ULEC would need to provide incoming and outgoing Trunk Groups for the Tandem Switching.

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OBF #58 (April 22, 1997)

- In summary, these issues will likely be decided by either the FCC or the courts. It appears that there is additional routing information that may be required in order for the ILEC to route the call correctly. Part of this issue could be addressed by adding an element to the AMA that would indicate that this trunk is part of an unbundled network (not who it belongs to). The ILEC would then need to do some sort of a lookup to determine where to route the call. Rodney Sampson remarked that we probably should format a question to the O&P committee to ensure that we haven't strayed from primary assumptions of that committee.
- What needs to happen now is to determine where the Loops and NIDs are billed. NYNEX would bill the NID on the Unbundled Line Port bill, but not sure where the Loop would be billed. SNET may bill Loops on the Facility Access account, but without the POI termination. When talking about these types of flat-rated and usage charges, are they on the same or different accounts? Depends on what is asked for. In some cases, the ILECs will offer the option to include Loops on either the IOF bills or on a unique bill while in other cases there will only be one option available. The combination of what is ordered will determine how it is billed. NID & Loop would be on the facilities bill, the Port and Switch charges would be on Unbundled Switched Port bill. PacBell would bill the NID on its own account.
- If ULEC orders stand-alone NID, how would it be billed? There is no loop ordered, because the ULEC is ordering the loop from someone else, or because they are a cable company with their own loop. Some companies, SNET included, may not agree that the NID is an order-able element under UNE rules.
- Unbundled Switch is similar to a Port, so ULECs would see a port and a switching charge associated with this element. For example in Access ILECs recover charges for ports within the switched access bills. So it seems likely that Unbundled Ports will be ordered and the Switching will be included. The ULEC will have to order both the Line and Trunk Ports in order to get out.
- Access in and out of the switch is provided by the Switching Charges (Switch & Trunk Port) and Line Port (Loop side) charges. The ILEC needs to offer the capability to plug into the switch at both sides.
- Switching Port charges will be on the usage-sensitive bill.
- Interoffice Facilities: Circuit-format with LocA and LocZ? Common transport rides on transport facilities that are typically high capacity T1/T3 circuits. Would probably have a CFA and a CLF.
- Unbundled IOF from Tandem to End Office order-able? Yes, would probably be special access-looking.

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OBF #58 (April 23, 1997)

- Tandem In and Out Ports available? Yes, used for cross-connects, could be called InterMachine Trunks. Because this is a piece of equipment it would probably have a USOC and be associated at the TSC level on the CSR.
- Tandem Switching; purchase the Tandem Ports, switching comes with it.
- POP to Tandem Entrance Facility; Can this be ordered as UNE also? If so, would probably look like a Special Access.
- Re: ULEC that will get a Facility Bill that also receives Access Facility Bill, would the ULEC want UNE charges on the existing Interexchange Facility Bill or on a new Facility Bill. General feeling is that it would on a separate bill. In some ILEC cases, the ULEC will need to specify the option.
- Billing for database/SS7 and Operator Services. Focus is that part of the network where transferring data to the STP, SCP etc. Are database access offerings being unbundled? For SNET, it looks like existing SS7 accounts with port termination, signaling links, access connections & access mileage. Basic queries include 500 and 800 services. Port termination charge would be at the STP. Rates associated with shared use of SNETs shared network when a carrier orders unbundled usage is still under development. In NYNEX for SS7 and LIDB, on LIDB will be record storage and update charges, not billed today. For some companies, the functionality that the SS7 links perform today will start billing as usage-sensitive charges.
- Port Termination has a flat rated USOC associated with it for SNET.
- SS7 overhead - "What is SS7?" In the SNET example, the port termination would be at the STP, Signaling Link connect STPs or 56kb End Offices to an STP. In Canada, the STP and End Office to STP are billed as A Links, between the STP and SCP is a D Link, is it the same in the US? Yes.
- Are port termination charges at each end of the link? No, only one is applicable. USWC said that some states may allow port and interconnection charges to apply when co-locating at an STP. Position made that one doesn't co-locate at the STP, there is a link to the STP.
- USWC Handout with SS7 architecture.
- Some companies may be able to bill call setup (ISUP) by message, other companies may have to bill flat-rate. TCAP charges are the database dips. There can be different rate elements in the ISUP and TCAP charges, such as signal and tandem switching charges. CLEC could possibly buy TCAP capabilities from an ILEC if they did not have SS7 capabilities.
- In USWC, cannot Meet Point Bill their SS7 network, nor can any other ILECs so far.

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OBF #58 (April 22, 1997)

- Working assumption that circuit accessing the SS7 must be a 56kb circuit, commonly called a Link in this forum. Must mux a hicap down to 56kb in order to enter the STP. SNET and NYNEX don't mux down, the use 56kb access points to the STP. For those companies, the POP SWC to STP link is invariable as a 56kb. No one was sure if they have been mandated to unbundled the A Link pieces, nor was anyone sure if the D Links will be unbundled. General consensus is that there do not need to be any new bill types or account structures to accommodate SS7. Recommendation was made to hold off on SS7 until OBF #59 because there are some changes coming down that may not be readily apparent at the present time.
- On 11 series records, Mitch, Glen and Message Processing got together and came up with "New Task Group under Billing to come up with recommendations for changes which would be submitted to METRG, who would handle physical update of document". This new group would not meet in conjunction with OBF, but would be more like SECAB. It was felt that Message Processing is retail-oriented, whereas Billing is more wholesale oriented. In addition, some of the Message Processing representatives have volunteered to attend also. The main problem is that neither committee really has expertise on the 11 series records, which is why having this Task Group meet independently may work the best, as companies could send their experts. Mary Beth Johnson (Bellcore) has volunteered to be the liaison between either Billing, or the new Task Group, and METRG. There was some discussion about Bellcore becoming the official liaison between the various committees. Several company representatives offered to serve on the Task Group. It is also possible for METRG to refuse to accommodate the changes recommended by this group, as they are an independent group, not part of ATIS.
- The objective of this new Task Group would be to make recommendations for changes to the 11-series records. The initial record working on would be the #1401 record. The intent would be to provide business requirements to Bellcore, who would prepare the detailed specifications for the METRG. This will require negotiations between Billing/ATIS and Bellcore. METRG is made up of representatives from the Bellcore client companies, most of whom do not have a familiarity with access billing issues. There needs to be knowledge of the 11-series records and Access Billing, including Meet Point Billing. Category 11 records, in many cases, drive the UNE billing. If Billing doesn't get involved, how can METRG be expected to accommodate their needs? Question asked if, because the 11-series records are Bellcore documents, couldn't Bellcore at some future date state that non-client companies would be prevented from using these records.

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Part B, Page 17 (Status History)

Issue: Billing for Unbundled Network Elements

(Page 17)

OBF #59 (August 12, 1997)

Mr. Wright led the discussion of issue 1287 by reviewing customer responses to homework carried over from issue 1286. The committee discussed at length the question of how an IXC will be notified when the traffic is carried by more than one Unbundled Local Exchange Carrier. The committee recognized that no process exists to address this issue. Furthermore, the committee also recognized that guidelines are needed as to how usage will be displayed on the customers bill when more than one Unbundled provider is involved. Consequently, two new issues were created (1548 and 1549) and were walked in during this OBF. The committee then reviewed call scenarios for unbundling. New elements were identified while others were deleted. Mr. Sampson reviewed the revised list of elements and discovered inconsistencies in the new list. As a result of this and other discussion, several homework items were assigned and the committee agreed to address this homework and continue working this issue at the interim Billing Committee meeting.

The following homework was assigned to the entire Billing Committee and is due at the Interim Meeting in September:

1. Will companies have a usage sensitive port charge in addition to a USG sensitive switching charge.
2. Is there a usage sensitive charge on a dedicated transport line (Bell Atlantic).

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Part B, Page 18 (Status History)

Issue: Billing for Unbundled Network Elements

(Page 18)

OBF #59 (August 12, 1997)

3. Categorize the list of charges into:

1. Tandem Charges
2. Transport Charges
3. End Office Charges
4. Loop Charges
5. Misc. elements

4. Work through the call scenarios identifying billable elements for the remaining unbundled products.

Following are the call scenarios and billable elements:

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Issue Category	RESOLVED

Part B, Page 19 (Status History)

Issue: Billing for Unbundled Network Elements

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OBF #59 (August 12, 1997)

1. LOCAL CALLS - INTRASWITCH ORIGINATING

CALL SCENARIOS

1. ULEC A Originates & ULEC B Terminates
2. ULEC A Originates & RESALE Terminates
3. ULEC A Originates & ILEC Terminates

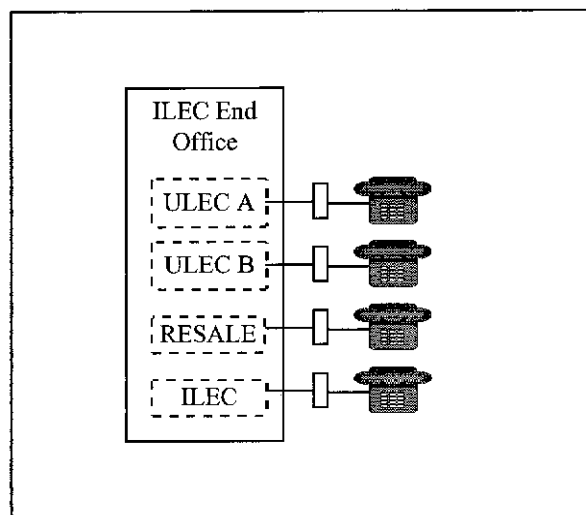
BILLABLE ELEMENTS

EO Line Side Ports

- Flat Rated
- Usage Rated

Local Switching

Data Processing, Recording & Transmission



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Issue Category	RESOLVED

Part B, Page 20 (Status History)

Issue: Billing for Unbundled Network Elements

(Page 20)

OBF #59 August 12, 1997

2. LOCAL CALLS - INTRASWITCH TERMINATING

CALL SCENARIOS

1. ULEC B Originates & ULEC A Terminates
2. RESALE Originates & ULEC A Terminates
3. ILEC Originates & ULEC A Terminates

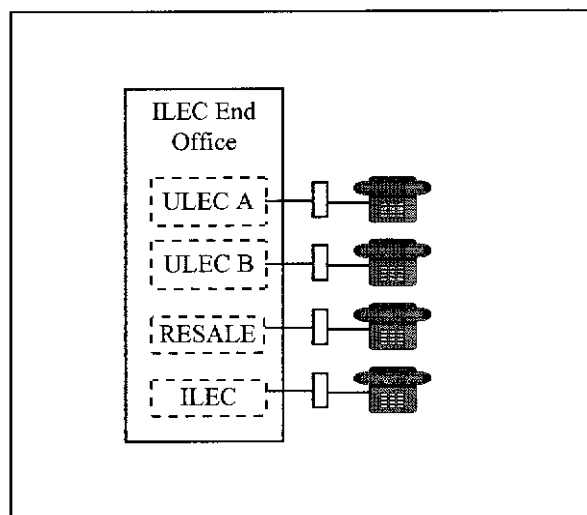
BILLABLE ELEMENTS

EO Line Side Ports

- Flat Rated
- Usage Rated

Local Switching

Data Processing, Recording & Transmission



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Issue Category	RESOLVED

Part B, Page 21 (Status History)

Issue: Billing for Unbundled Network Elements

(Page 21)

OBF #59 August 12, 1997

3. LOCAL CALLS - INTERSWITCH ORIGINATING

CALL SCENARIOS

1. ULEC A Originates & ULEC B Terminates
2. ULEC A Originates & RESALE Terminates
3. ULEC A Originates & ILEC Terminates

BILLABLE ELEMENTS

EO Line Side Ports

- Flat Rated
- Usage Rated

Local Switching

Interconnection

EO Trunk Side Ports

- Common Trunk Port Usage Sensitive
- Dedicated Trunk Port Flat Rated

Transport

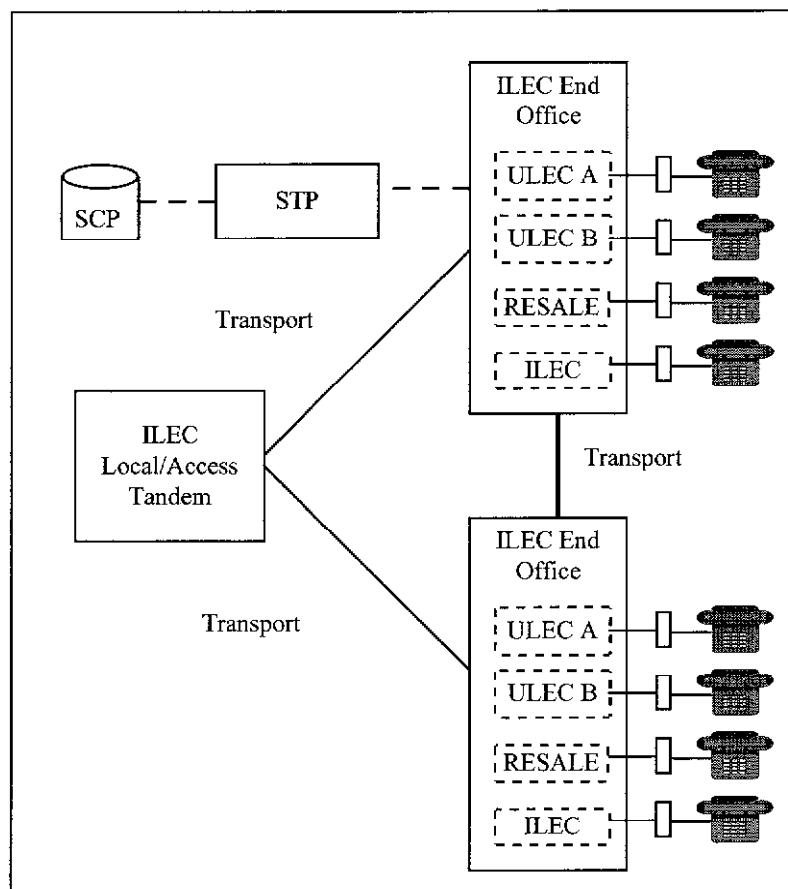
- Common Transport Usage Sensitive
- Dedicated Transport Flat Rated
- Interswitch Composite Access - ILEC

Tandem Trunk Ports

- Common Trunk Port Usage Sensitive
- Dedicated Trunk Port Flat Rated

Tandem Switching

Data Processing, Recording & Transmission



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Issue Category	RESOLVED

Part B, Page 22 (Status History)

Issue: Billing for Unbundled Network Elements

(Page 22)

OBF #59 August 12, 1997

4. LOCAL CALLS - INTERSWITCH TERMINATING

CALL SCENARIOS

1. ULEC B Originates & ULEC A Terminates
2. RESALE Originates & ULEC A Terminates
3. ILEC Originates & ULEC A Terminates

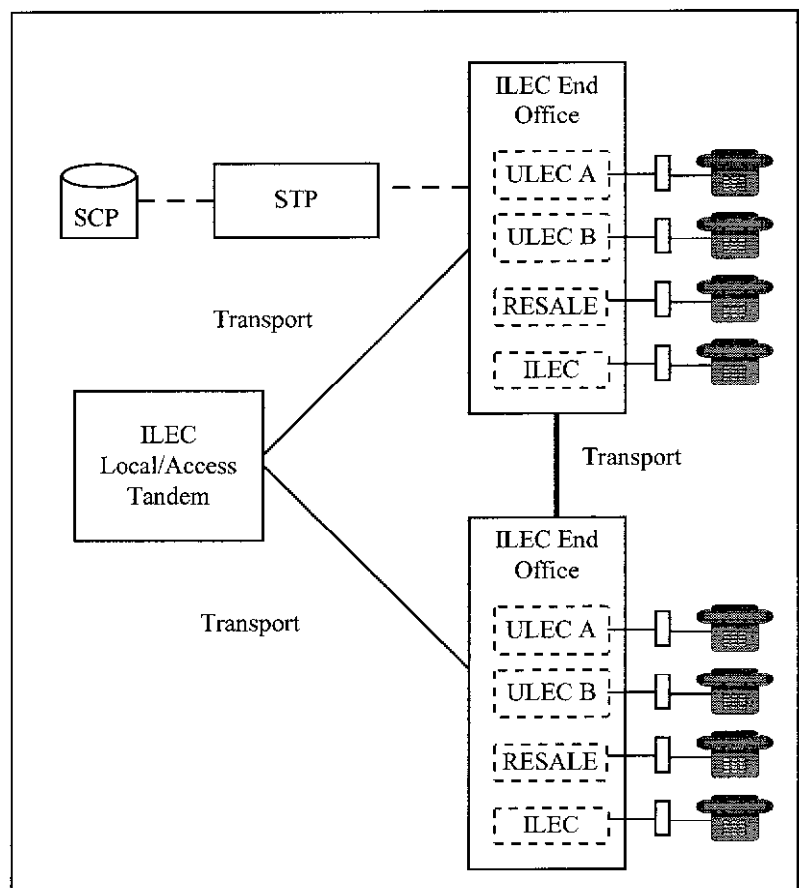
BILLABLE ELEMENTS

EO Line Side Ports

- Flat Rated
- Usage Rated

Local Switching

Data Processing, Recording & Transmission



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Issue Category	RESOLVED

Part B, Page 23 (Status History)

Issue: Billing for Unbundled Network Elements

(Page 23)

OBF #59 August 12, 1997

5. LOCAL CALLS - INTERSWITCH ORIGINATING

CALL SCENARIOS

1. ULEC A Originates & CLEC C Terminates

BILLABLE ELEMENTS

EO Line Side Ports

- Flat Rated
- Usage Rated

Local Switching

Interconnection

EO Trunk Side Ports

- Common Trunk Port Usage Sensitive
- Dedicated Trunk Port Flat Rated

Transport

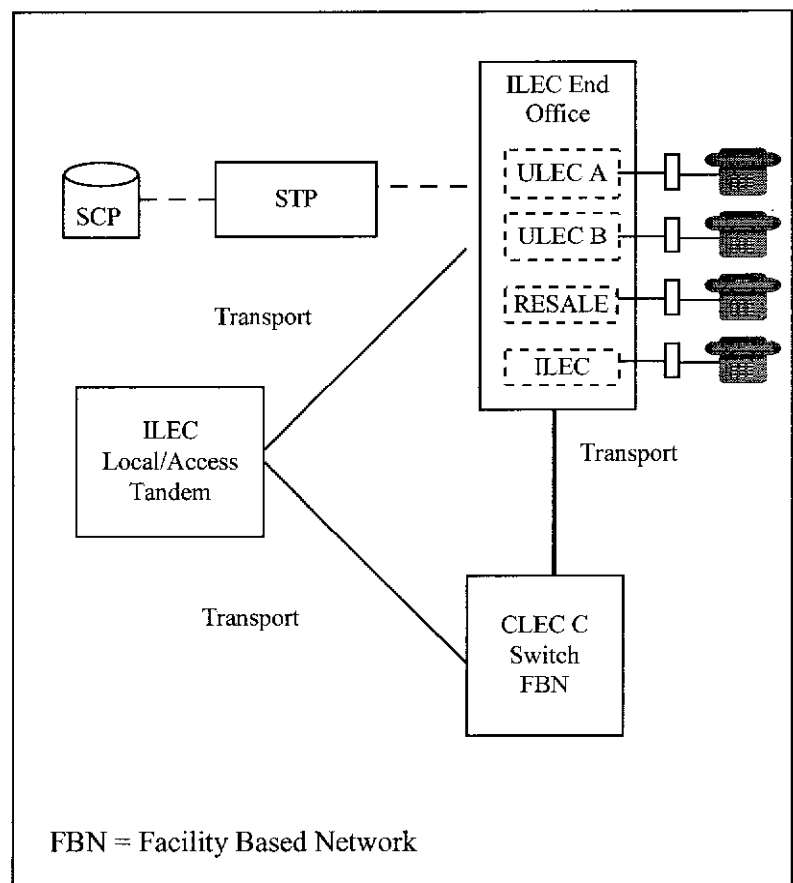
- Common Transport Usage Sensitive
- Dedicated Transport Flat Rated
- Interswitch Composite Access - CLEC

Tandem Trunk Ports

- Common Trunk Port Usage Sensitive
- Dedicated Trunk Port Flat Rated

Tandem Switching

Data Processing, Recording & Transmission



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Issue Category	RESOLVED

Part B, Page 24 (Status History)

Issue: Billing for Unbundled Network Elements

(Page 24)

OBF #59 August 12, 1997

6. LOCAL CALLS - INTERSWITCH TERMINATING

CALL SCENARIOS

1. CLEC C Originates & ULEC A Terminates

BILLABLE ELEMENTS

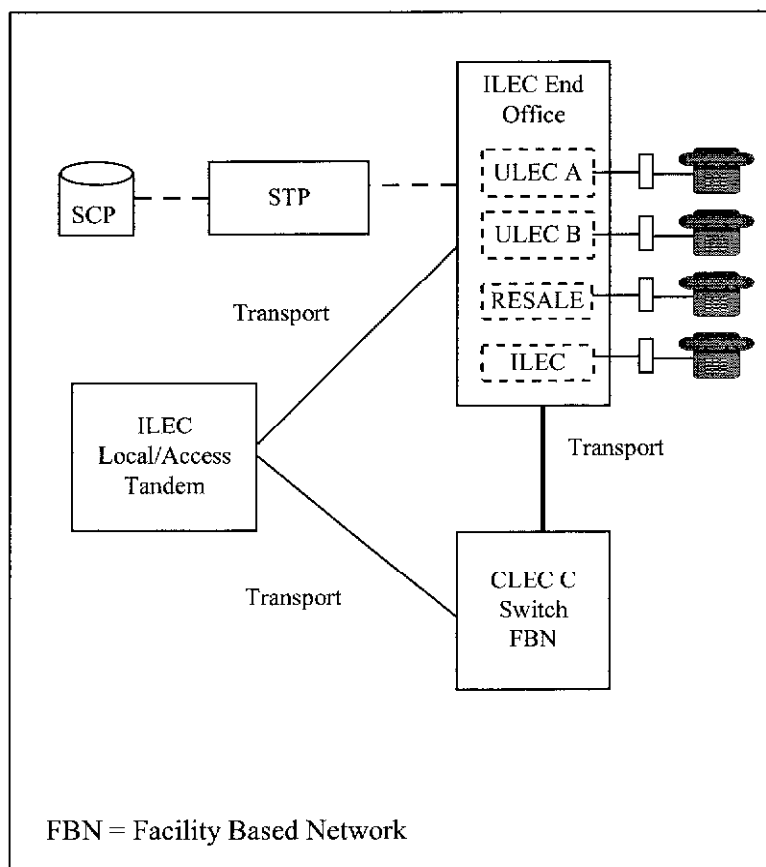
EO Line Side Ports

•Flat Rated

•Usage Rated

Local Switching

Data Processing, Recording & Transmission



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Issue Category	RESOLVED

Part B, Page 25 (Status History)

Issue: Billing for Unbundled Network Elements

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OBF #59 August 12, 1997

7. TOLL CALLS - INTRALATA ORIGINATING

CALL SCENARIOS

1. ULEC A Originates & ULEC B Terminates
2. ULEC A Originates & RESALE Terminates
3. ULEC A Originates & ILEC Terminates

BILLABLE ELEMENTS

EO Line Side Ports

- Flat Rated
- Usage Rated

Local Switching

Interconnection

EO Trunk Side Ports

- Common Trunk Port Usage Sensitive
- Dedicated Trunk Port Flat Rated

Transport

- Common Transport Usage Sensitive
- Dedicated Transport Flat Rated

Tandem Trunk Ports

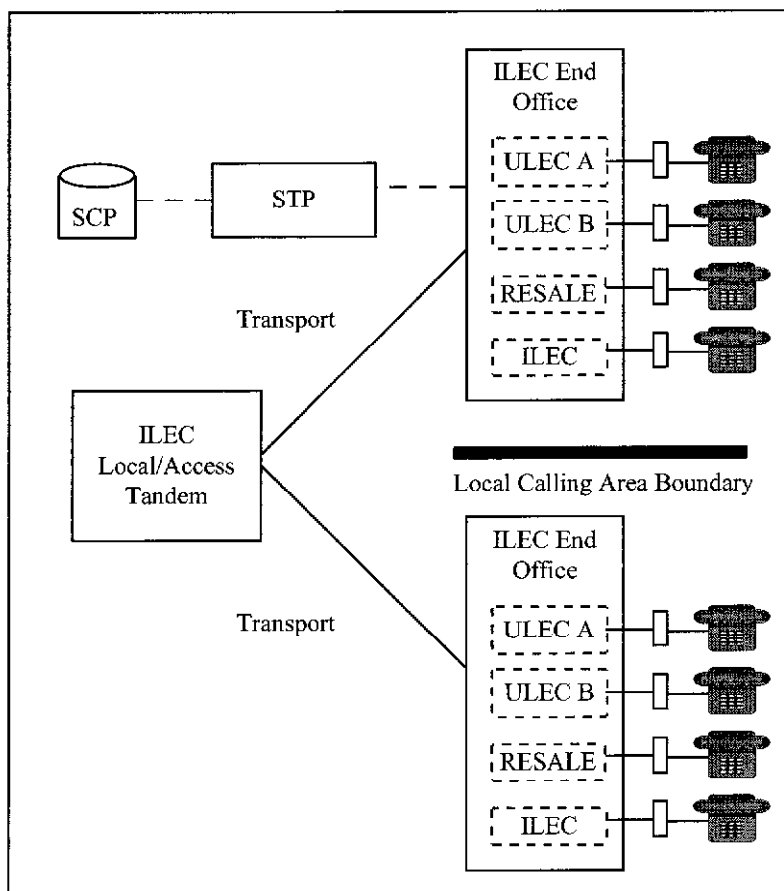
- Common Trunk Port Usage Sensitive
- Dedicated Trunk Port Flat Rated

Tandem Switching

Carrier Common Line

Data Processing, Recording & Transmission

Call Setup



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Issue Category	RESOLVED

Part B, Page 26 (Status History)

Issue: Billing for Unbundled Network Elements

(Page 26)

OBF #59 August 12, 1997

8. TOLL CALLS - INTRALATA TERMINATING

CALL SCENARIOS

1. ULEC B Originates & ULEC A Terminates
2. RESALE Originates & ULEC A Terminates
3. ILEC Originates & ULEC A Terminates

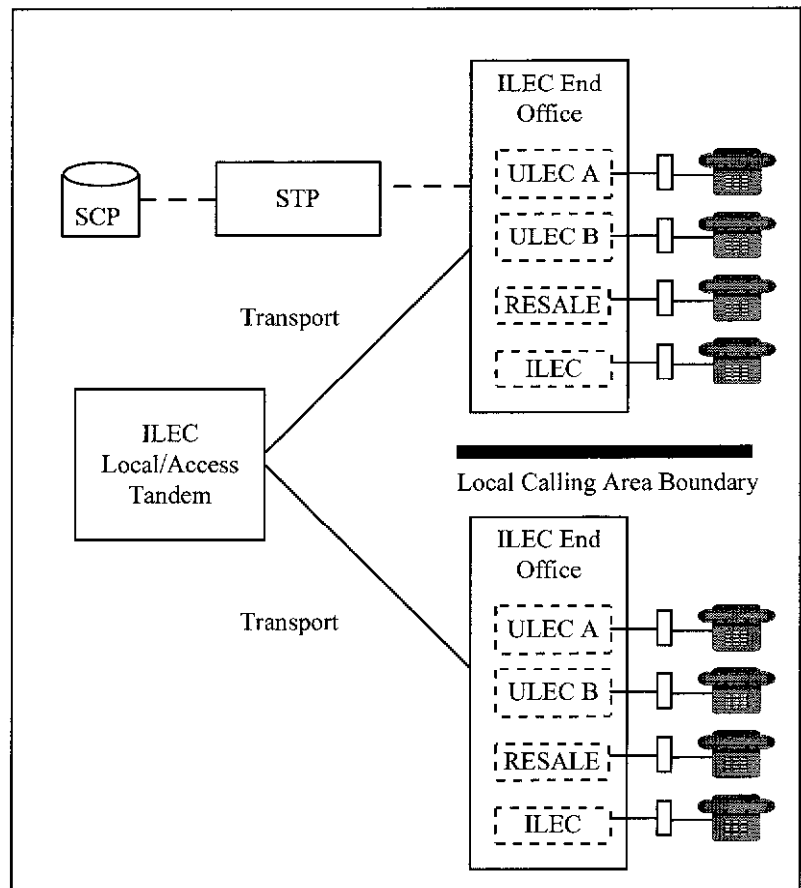
BILLABLE ELEMENTS

EO Line Side Ports

- Flat Rated
- Usage Rated

Local Switching

Data Processing, Recording & Transmission



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Issue Category	RESOLVED

Part B, Page 27 (Status History)

Issue: Billing for Unbundled Network Elements

(Page 27)

OBF #59 August 12, 1997

9. TOLL CALLS - INTRALATA ORIGINATING

CALL SCENARIOS

1. ULEC A Originates & CLEC C Terminates

BILLABLE ELEMENTS

EO Line Side Ports

- Flat Rated
- Usage Rated

Local Switching

Interconnection

EO Trunk Side Ports

- Common Trunk Port Usage Sensitive
- Dedicated Trunk Port Flat Rated

Transport

- Common Transport Usage Sensitive
- Dedicated Transport Flat Rated
- Interswitch Composite Access - CLEC

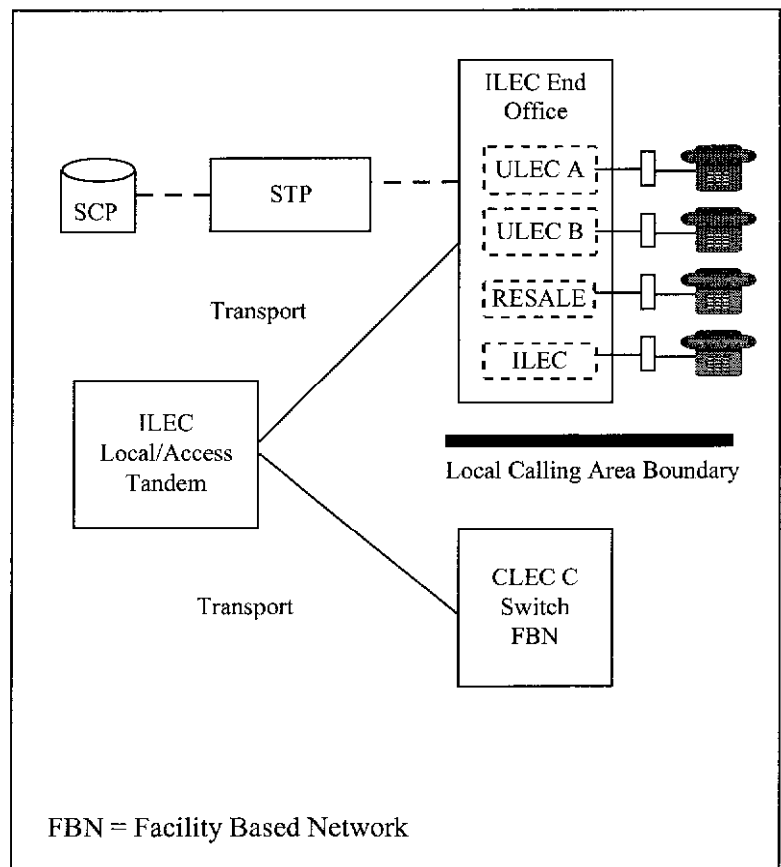
Tandem Switching

Tandem Trunk Ports

- Common Trunk Port Usage Sensitive
- Dedicated Trunk Port Flat Rated

Data Processing, Recording & Transmission

Call Setup



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Issue Category	RESOLVED

Part B, Page 28 (Status History)

Issue: Billing for Unbundled Network Elements

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OBF #59 August 12, 1997

10. TOLL CALLS - INTRALATA TERMINATING

CALL SCENARIOS

1. CLEC C Originates & ULEC A Terminates

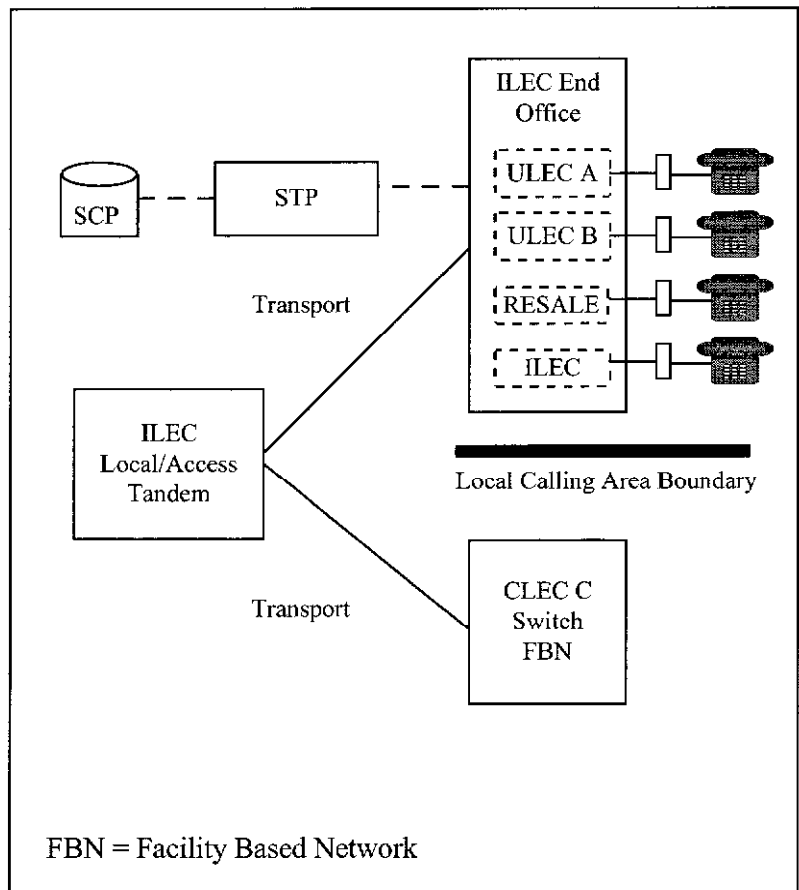
BILLABLE ELEMENTS

EO Line Side Ports

- Flat Rated
- Usage Rated

Local Switching

Data Processing, Recording & Transmission



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Issue Category	RESOLVED

Part B, Page 29 (Status History)

Issue: Billing for Unbundled Network Elements

(Page 29)

OBF #59 August 12, 1997

11. TOLL CALLS - INTRASTATE/INTERLATA ORIGINATING

CALL SCENARIOS

1. ULEC A Originates & IXC Terminates

BILLABLE ELEMENTS

EO Line Side Ports

- Flat Rated
- Usage Rated

Local Switching

Interconnection

EO Trunk Side Ports

- Common Trunk Port Usage Sensitive
- Dedicated Trunk Port Flat Rated

Transport

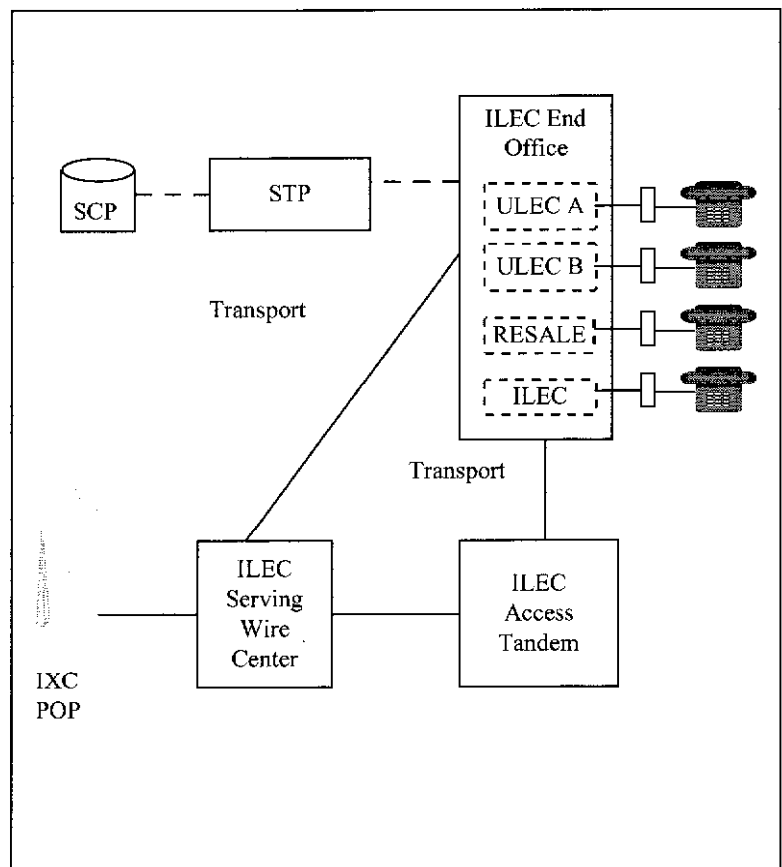
- Common Transport Usage Sensitive
- Dedicated Transport Flat Rated

Tandem Switching

Tandem Trunk Ports

- Common Trunk Port Usage Sensitive
- Dedicated Trunk Port Flat Rated

Data Processing, Recording & Transmission
Call Setup



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Issue Category	RESOLVED

Part B, Page 30 (Status History)

Issue: Billing for Unbundled Network Elements

(Page 30)

OBF #59 August 12, 1997

12. TOLL CALLS - INTRASTATE/INTERLATA TERMINATING

CALL SCENARIOS

1. IXC Originates & ULEC A Terminates

BILLABLE ELEMENTS

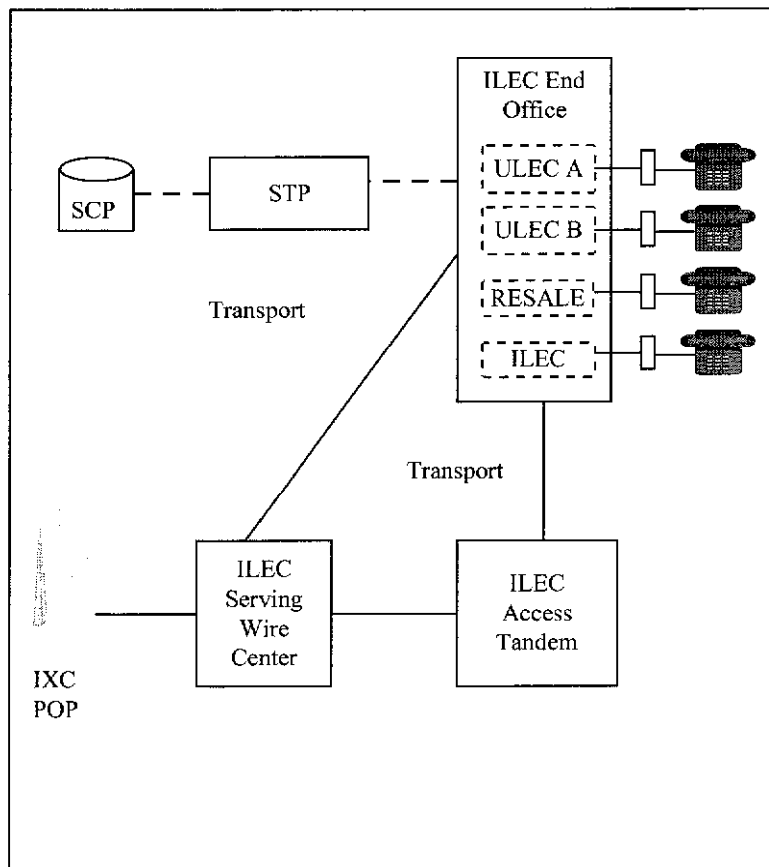
EO Line Side Ports

•Flat Rated

•Usage Rated

Local Switching

Data Processing, Recording & Transmission



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Issue Category	RESOLVED

Part B, Page 31 (Status History)

Issue: Billing for Unbundled Network Elements

(Page 31)

OBF #59 August 12, 1997

13. TOLL CALLS - INTERSTATE ORIGINATING

CALL SCENARIOS

1. ULEC A Originates & IXC Terminates

BILLABLE ELEMENTS

EO Line Side Ports

- Flat Rated
- Usage Rated

Local Switching

Interconnection

EO Trunk Side Ports

- Common Trunk Port Usage Sensitive
- Dedicated Trunk Port Flat Rated

Transport

- Common Transport Usage Sensitive
- Dedicated Transport Flat Rated

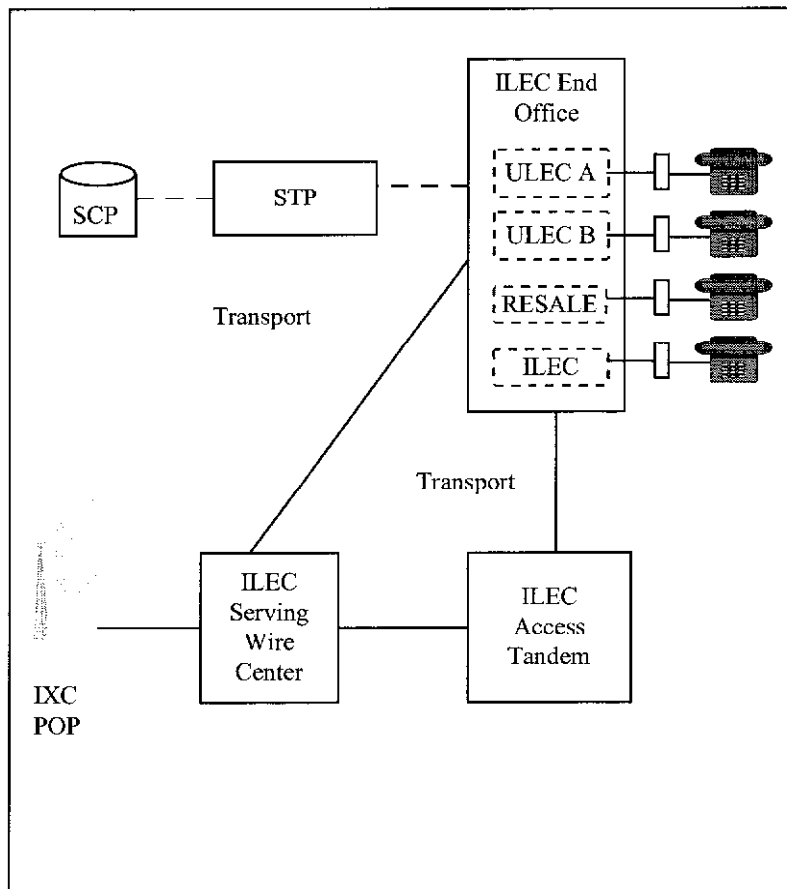
Tandem Switching

Tandem Trunk Ports

- Common Trunk Port Usage Sensitive
- Dedicated Trunk Port Flat Rated

Data Processing, Recording & Transmission

Call Setup



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Issue Category	RESOLVED

Part B, Page 32 (Status History)

Issue: Billing for Unbundled Network Elements

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OBF #59 August 12, 1997

14. TOLL CALLS - INTERSTATE TERMINATING

CALL SCENARIOS

1. IXC Originates & ULEC A Terminates

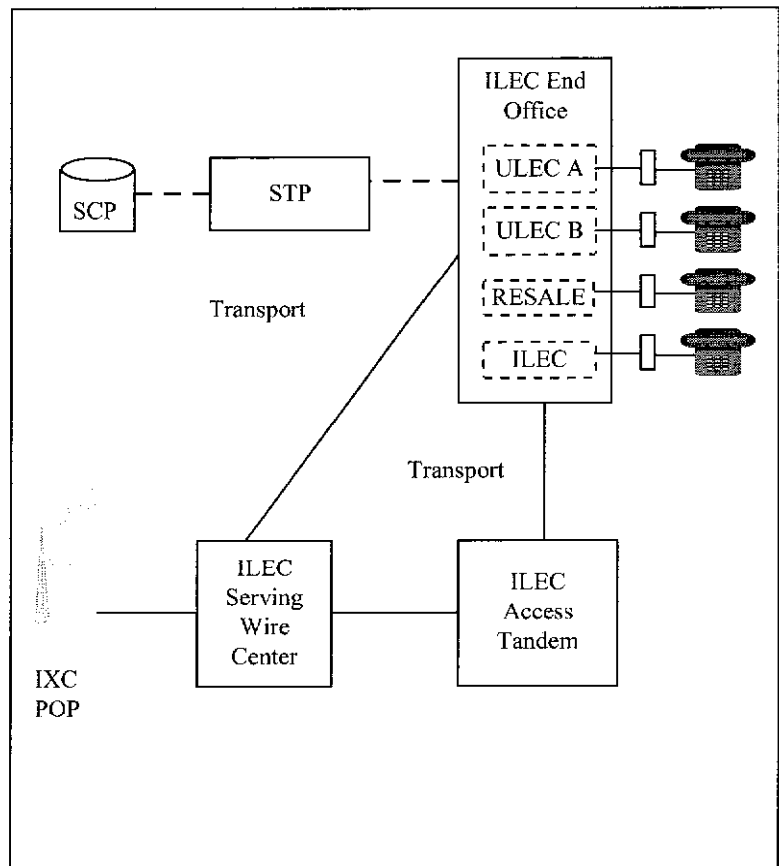
BILLABLE ELEMENTS

EO Line Side Ports

- Flat Rated
- Usage Rated

Local Switching

Data Processing, Recording & Transmission



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Issue Category	RESOLVED

Part B, Page : 3
(Status History)

Issue: Billing Unbundled Network Elements

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OBF #59 August 12, 1997

Mr. Sampson then compared the list of rate elements completed in issue 1286 with the elements identified during the previous discussions of the call scenarios. During Mr. Sampson's comparison he found the following rate elements were not identified during the discussion:

- Long Distance
- Local Loop
- All-Call-related Database/SS7/SMS
- Operations Support Services
- Network Interface Device

A GTE representative asked if scenarios assumed no pre-subscription. Mr. Wright replied yes.

Mr. Wright noted that the previous discussions on the call scenarios only addressed switching elements and these elements listed by Mr Sampson apply to other than switching. The committee agreed there was a need to review the scenarios again to see where these or any additional elements would apply.

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Part B, Page 34 (Status History)

Issue: Billing for Unbundled Network Elements

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OBF #59 August 12, 1997

At this meeting it was decided to move Issue 1286 - Billing for Unbundled Switching Elements into Final Closure and combine the status history of Issue 1286 with that of 1287. The following is the complete status history of Issue 1286:

Issue 1286 Status History (Page 1) OBF #55 (August 26, 1996)

Issue Introduction and Acceptance

Tami Spocogee (Worldcom) presented this issue which was seeking the establishment of a method in which the Unbundled Switching Elements can be displayed and defined on both paper and mechanized bills. Ms. Spocogee explained that this issue was a result of a recent FCC Order. As such, she requested the Committee to accept this issue under the "expedited process".¹

After further discussion, this issue **was accepted** and assigned #1286.

Additional Discussion

Ms. Spocogee explained that the basis for this issue was the recently released FCC Order that addressed Local Competition Provisions in the Telecommunications Act of 1996 (FCC 96-325, CC Docket No. 96-98). Under this Order, Local Service Providers (LSPs) will be able to order unbundled features from the general exchange tariff, as well as access service with unbundled features from the access tariff. If an LSP does not want to resell its service, it would not have to buy an entire package. The switching capabilities provided at the end office will allow an LSP to simply order various features such as touch tone, custom calling, and switching for access. An LSP will be able to purchase local switching network elements, local

¹The expedited process allows for an issue to be walked-in and discussed at the same OBF.

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Part B, Page 35 (Status History)

Issue: Billing for Unbundled Network Elements

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OBF #59 August 12, 1997

loops (rather than ports) and unbundled network elements from the Local Exchange Company.

Ms. Spocogee also indicated that this could impact existing pricing (for example, instead of all the current access elements, only 75% of the RIC and CCL charges would apply to an IXC [since the IXC is allowed to provide local service]). She also

Issue 1286 Status History (Page 2) OBF #55 (August 26, 1996)

indicated that this Order was scheduled to be implemented around mid-1997. Additionally, there will be an access restructure that pulls out the current subsidies (May/June 1997, or earlier) as well as other conditions that a LEC has to meet in order to offer long distance service in its own region.

Additional Discussion (Continued)

The NECA representative questioned this information and indicated that she had a different interpretation of the Order. She agreed the Order allowed a CLEC to purchase the unbundled local switching and network components. However, she believed the unbundled elements could only be used in the provision of local service (cannot be used to provide access service) and that an IXC would **not** be exempt from "traditional" access charges. While the Order could affect access to some degree, the unbundled service elements represented a completely different product (that was not access, not resale, not CLEC). She reminded the Committee that her statements represented her current interpretation, just as Ms. Spocogee's statements represented the interpretation of her company. Both interpretations could be wrong. As such, she encouraged Committee representatives to research and obtain an understanding of their company's position.

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Part B, Page 36 (Status History)

Issue: Billing for Unbundled Network Elements

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OBF #59 August 12, 1997

Action Items Assigned

Following further discussion, the Committee identified the following action items:

- Clarification from each regulatory company on the interpretation.
- Can an end office bill both unbundled switching and resale? By Customer? By CIC? By Trunk Group?
- If tandem switching is bought, are all subtending end offices required to have unbundled switching? Including end offices belonging to other entities?

Feedback is to be provided at OBF #56.

Issue 1286 STATUS HISTORY (Page 3)

OBF #56 (October 22, 1996)

Prior to the beginning of this discussion, Mitch Wright stated, for the record, that any comment he may make regarding this issue was in his capacity as a facilitator (co-leader) and not as a U S WEST representative.

Ms. Spocogee reminded the Committee of the homework items assigned during OBF #56. Based on her investigation, she reported that there could be unbundled switching, resale, and, possibly, facility based (bundled, regular access) services out of the same end office. These arrangements can be different by customer and could go over the same trunk group. The AT&T Local representative supported these observations, and indicated there is a possibility of having a "super trunk group" that carries all three services. Given this condition, they questioned how a distinction between the three services could be accomplished.

The Ameritech representative observed that something may be needed in the AMA recording to denote, for example, unbundled port traffic vs. Regular access. This indicator would have to be something other than trunk group since trunk group identification is not always available. She also observed that unbundled switching has different rate elements.

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Issue Category	RESOLVED	

Part B, Page 37 (Status History)

Issue: Billing for Unbundled Network Elements

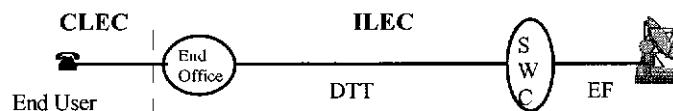
(Page 37)

OBF #59 - August 12, 1997

Issue 1286 Status History (con't)

Sue Snyder shared the following scenario that S.N.E.T. was exploring:

Scenario 1: Interstate (Unbundled) Toll



In this model:

- The loop is provided by the CLEC
- Interconnection is at the MDF of the ILEC
- ILEC bills the CLEC the following
 - CCL
 - 75% of interconnect
 - Mou for Local Switching
 - Interconnection Charge (flat rated)
 - Line port charges
- ILEC bills the IXC
 - EF
 - DT
- CLEC bills the IXC (unknown)

Issue 1286 STATUS HISTORY (Page 4)

OBF #56 (October 22, 1996)

Based on this example, Ms. Snyder indicated that access billing did not appear to change. Some customers questioned this, and asked what would occur if the CLEC and IXC were separate entities. They wondered how a company can bill for a facility that did not belong to them (in this case, the ILEC does not own the loop; therefore, the ILEC should not bill CCL). Other representatives questioned if a scenario involving resold loops vs CLEC provided loops were examined. Ms. Snyder indicated that this scenario was not addressed. She also indicated that the application of CCL charge was based on a current interpretation of the FCC order.

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Issue: Billing for Unbundled Network Elements

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OBF #59 - August 12, 1997

Issue 1286 Status History (con't)

Based on questions and further discussion, Rodney Sampson (Customer Co-Leader) suggested that the Committee address a list of assumptions and questions based on this model. The following reflects the results of this effort.

Assumptions for Scenario 1

- IXC, ILEC, and LEC are different entities
- CLEC has purchased resold loop from the ILEC
- CLEC has purchased unbundled local switching (LS) at the ILEC End Office
- IC carried the call (Inter or Intra LATA)
- Access was purchased from the ILEC by the IXC
- The IXC can choose which entity access will be purchased from

Questions

- How will unbundled switching elements be shown when they appear on the same trunk group as normal access (FID or AMA indicator)?
- How will the IXC know it will be billed by the CLEC?
- How will the IXC know that unbundled switching elements have been sold at the end office?
- Can a CLEC purchase unbundled local switching for access?

Issue 1286 STATUS HISTORY (Page 5)

OBF #56 (October 22, 1996)

One customer expressed concern over the number of potential bills that could be generated. She believed that since bought a direct route from the incumbent LEC to terminate her traffic, she should receive only one bill from the incumbent LEC. (This implies that the incumbent LEC and the CLEC should enter into an arrangement so that only one bill is issued to the IXC.) She also questioned how she would know who would be issuing these bills.

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Issue: Billing for Unbundled Network Elements

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Issue 1286 Status History (Con't)

One provider observed that the IXC would know if a CLEC purchased unbundled service from the ILEC. The CLEC, as the loop provider, would have end users that are presubscribed to a particular IXC; an arrangement would need to be made between the

CLEC and the IXC to handle the calls. Another provider questioned the request for a single billing arrangement. In her opinion, if unbundled elements were resold, meet point would not be applicable. One customer disagreed since the ILEC would still be involved with providing the IXC with a portion of the service. The ILEC has to know who it sold its service to in order to complete the call.

After further discussion, the MFS representative suggested the Committee examine some basic call flows. Based on these call flows, homework items can be identified. The Committee agreed with this suggestion, and a small working group was formed to develop the scenarios. Representatives from Time Warner, Ameritech, WORLDCOM, AT&T Local, MCI Metro, BellSouth, Commonwealth Long Distance and MFS agreed to participate in an after-hours work session.

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Part B, Page 40 (Status History)

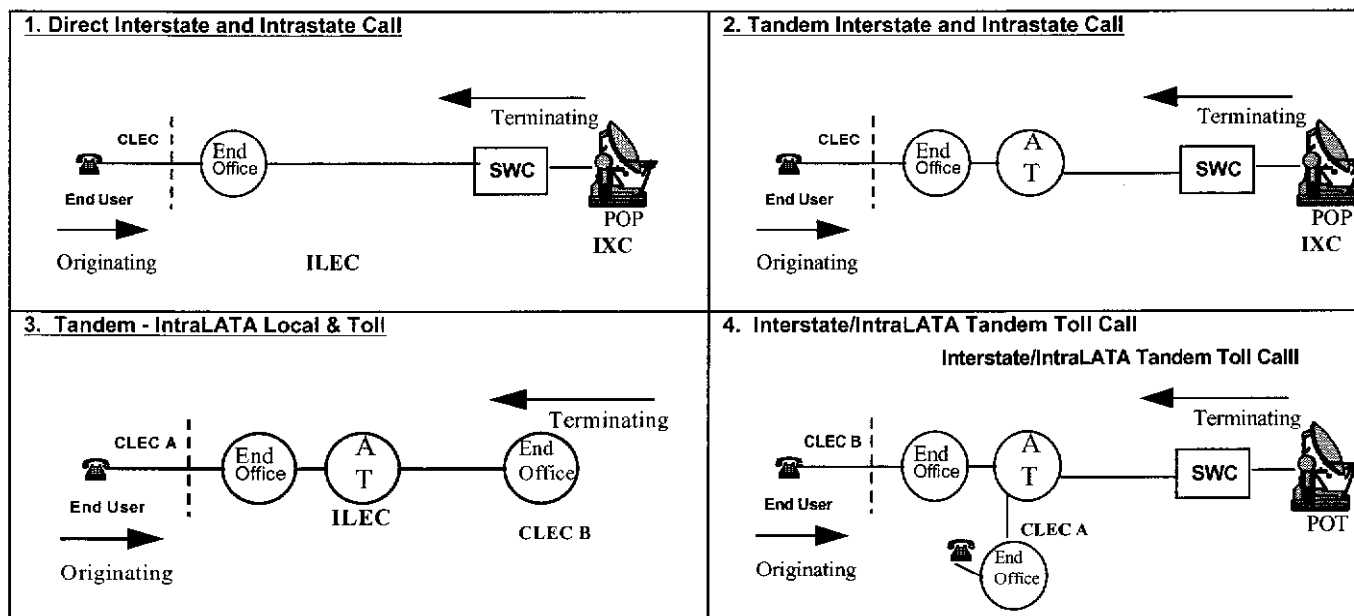
Issue: Billing for Unbundled Network Elements

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OBF #59 - August 12, 1997

Issue 1286 Status History (Con't)

Tami Spocogee presented the following working group scenarios to the Committee:



Based on these scenarios, the Working Group suggests that Committee representatives research the charges that would be billed to each of the entities for a specific scenario. This should be done for both originating and terminating traffic, and take into account the various affiliations.

The Committee agreed, and this was taken as a homework item and provide **feedback during a conference call scheduled for January 14, 1997.**

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Issue 1286 Status History (con't)

Note:

Exhibit 1 provides a complete list of **all** the homework items. A "spread sheet" that displays the scenarios, and the questions specific to each, is included. To avoid any confusion, this sheet should be used to document the homework responses. If you wish your responses to be distributed prior to the call, they should be sent to the Billing Committee Administrator for receipt no later than January 2, 1997. E-mail is acceptable (and preferred); the address is mjohnso3@notes.cc.bellcore.com.

Issue 1286

GENERAL HOMEWORK QUESTIONS

How will unbundled switching elements be shown when they appear on the same trunk group as normal access? [AMA indicator & FID?]

How will the IXC know it will be billed by the CLEC?

How will the IXC know that unbundled switching elements have been sold at the end office?

Can a CLEC purchase unbundled local switching on an access call?

Can the IXC choose the entity (CLEC or ILEC) from which access will be purchased.

In addition to the above questions, the next several pages requests identification of billable elements.

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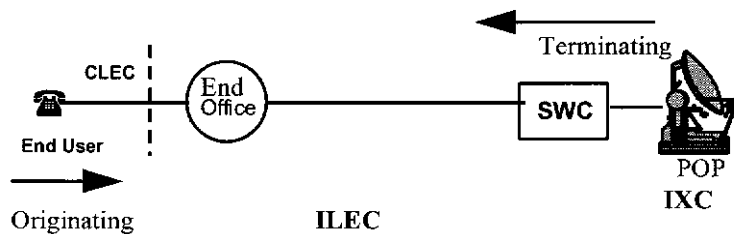
OBF #59 - August 12, 1997

Issue 1286 Status History (Con't)

1286 Homework

Based on the scenarios below, companies are to list their billable elements.

1. Direct Interstate and Intrastate Call



A. Non Facility Based - CLEC and IXC are affiliated

	ILEC Bills CLEC	ILEC Bills IXC	CLEC Bills IXC
Originating			
Terminating			

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Issue 1286 Status History (Con't)

B. Non Facility Based - CLEC and IXC are NOT affiliated

	ILEC Bills CLEC	ILEC Bills IXC	CLEC Bills IXC
Originating			
Terminating			

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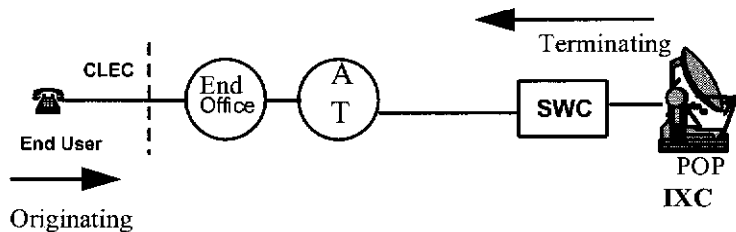
OBF #59 - August 12, 1997

Issue 1286 Status History (Con't)

Issue 1286 - Homework(Continued)

Based on the scenarios below, companies are to list their billable elements.

2. Tandem Interstate and Intrastate Call



A. Non Facility Based - CLEC and IXC are affiliated

	ILEC Bills CLEC	ILEC Bills IXC	CLEC Bills IXC
Originating			
Terminating			

Issue Identification Form

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B. Non Facility Based - CLEC and IXC are NOT affiliated

	ILEC Bills CLEC	ILEC Bills IXC	CLEC Bills IXC
Originating			
Terminating			

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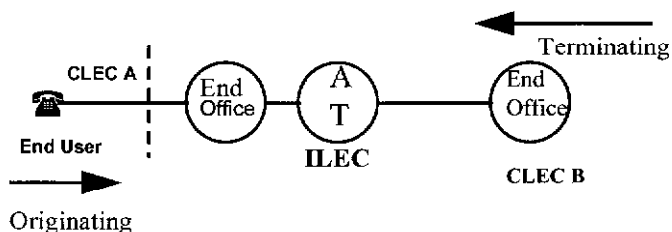
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Issue 1286 Status History (Con't)

1286 Homework (Continued)

3. Tandem - IntraLATA Local & Toll



A. Non Facility Based - CLEC A and CLEC B are affiliated

	ILEC Bills CLEC	ILEC Bills IXC	CLEC Bills IXC
Originating			
Terminating			

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B. Non Facility Based - CLEC A and CLEC B are NOT affiliated

	ILEC Bills CLEC	ILEC Bills IXC	CLEC Bills IXC
Originating			
Terminating			

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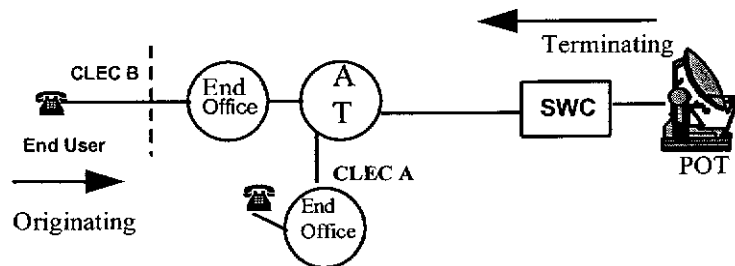
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Issue 1286 Status History (Con't)

1286 Homework (Continued)

4. Interstate/IntraLATA Tandem Toll Call

Interstate/IntraLATA Tandem Toll Call



	ILEC Bills CLEC	ILEC Bills IXC	CLEC Bills IXC
Originating			
Terminating			

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	ILEC Bills CLEC	ILEC Bills IXC	CLEC Bills IXC
Originating			
Terminating			

Do iterations for:

- When CLEC A & IXC are the same
- When CLEC A & IXC are different & CLEC B is different
- CLEC B & IXC are the same

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OBF #59 - August 12, 1997

Issue 1286 Status History (Page 6)
Conference Call (January 14, 1997)

Issue Introduction and Acceptance

Rodney Sampson (Customer Co-Leader) reviewed the homework items and questioned if the group understood what is being unbundled (a line port or something more). He also questioned if the unbundling was limited to the end office switch or if it also included the tandem as well. After some discussion, it was agreed that while unbundling may occur at the tandem level, the group would be better served to limit the discussion to the end office.

Additional Discussion

The NYNEX representative indicated that issue 1286 looked similar to Issue 1141 since it involved usage related charges. (The CSR would present information at the TN level, similar to resale). Issue 1287 seems like it would contain the monthly recurring charges.

The WORLDCOM representative believed that the FCC order stated that unbundled switching elements can either be flat rated or MOU sensitive. She believed the Committee could work under the assumption that it would be MOU sensitive. An MCI representative questioned how a port could be billed on a usage sensitive basis. One representative explained that an unbundled port is affiliated with a TN and that there would be usage over the line port. The MOU charge is related to switch processing (CPU). Based on this discussion, one representative questioned if switching capability could be another unbundled element.

One representative observed that there could be different ways to bill a call. It could be billed flat rated (regardless of the capabilities) or it could be billed based on each capability the switch performs. The GTE representative indicated that she believed that they had a mixture of non-recurring charges (for vertical features) and usage sensitive charges.

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Issue 1286 Status History (Page 7) Conference Call (January 14, 1997)

Additional Discussion (con't.)

Marsha Evans (SWBT Bell Project Manager for Unbundled Local Switching) provided the Committee with her company's current view of the Order, which included:

- a flat rated port (end user related - lineside/trunkside)
- a port that transports traffic (billing depends on what unbundled elements it is connected to)
- an unbundled switched port (collocation arrangement; dedicated, trunk port with an unbundled network connection to a specific end user that is connected to a common trunk. Port looks like it is dedicated but is actually shared. Cost is in the usage charge associated with switching).

The Local Service Provider (LSP) would buy different end user ports, then chooses how the traffic leaves the end office (i.e., as unbundled dedicated transport, unbundled common transport, or as a collocated arrangement). Depending on the option, there could be two usage charges (unbundled network vs. unbundled local switching). The NYNEX representative indicated they were similar to the extent they may bill Common Transport and Unbundled Local Switching (under 1286 as usage). Pacific Bell also indicated they were similar to SWBT and would have some dedicated and some common transport charges.

The NYNEX representative indicated he could have two bills; one for the line port, the other for the trunk port.

Mr. Sampson questioned how other companies would be presenting this information. Representatives from S.N.E.T., ALLTEL, and Cincinnati Bell indicated their companies were still trying to define their positions.

The NYNEX representative indicated that they have a bill type in place - Account Type P. This is when

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Issue 1286 Status History (Page 8)
Conference Call (January 14, 1997)

Additional Discussion (con't.)

the terminating end is billed for the interconnection and operator charges. The SWBT representative advised that the end user port will be billed at the local switch. Unbundled transport or collocation will be associated with transport unbundled switching elements like a facility. It would appear on a facility type bill. The SWBT representative emphasized that it is important to note that the Local Switching Provider (LSP) is in business to serve the end user. There is a distinct difference between the ports used for this function and the ports that are used to transport and terminate calls. Unbundled trunkside usage is different than traditional access, as is the pricing.

When questioned, the SWBT representative explained that the account that would contain the unbundled charges is structured like switched access. While similar to switched access, it would have different rate elements. The charges are being kept separate (Feature Group U).

The NYNEX representative indicated they are planning to bill the unbundled line port charges on a new type of account (i.e., "J"). The Type of Account J will have usage sensitive charges (at the end office level) displayed in the Detail of Usage Charge section and flat rated monthly recurring charges (at the TN level) displayed on the CSR. NYNEX is using a Feature Group U value for their internal process; however, it will not be displayed on the bill. He then questioned if the customers needed an indicator at the account level to identify the bill as being unbundled. One customer indicated she would prefer an account level indicator. Another customer indicated that he would need to have unbundled charges uniquely identified; however, he was uncertain of the necessity of providing an indicator at the account level.

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Issue 1286 Status History (Page 9) Conference Call (January 14, 1997)

A customer representative questioned how discounts would be handled. One provider believed that there would not be a discount since one local switching provider buys the service to be used by all customers. Therefore, it did not appear that discounts come in to play. Another provider believed that the Local Switching Provider would be billed for the unbundled switching functions. The IXC would be billed for everything else (except LS2). However some representatives questioned this approach and believed the IXC may not be billed Carrier Common Line charges. There is also some uncertainty about the RIC.

Following further discussion, a SWBT representative explained that if the LSP decided to get to a termination point, the LSP would need:

- Common transport (local switching and unbundled common transport (usage sensitive),
- Dedicated Transport (unbundled local switching and flat rated unbundled dedicated transport),
- OR a hand-off at the collocation cage (unbundled local switching and co-location elements)

When questioned if there were different non-recurring charges for a port, a SWBT representative explained that the following were possible

- analog line port
- analog trunk port
- digital trunk port
- BRI (ISDN-like) port
- PRI port

There could be variations (e.g., for Centrex)

Mr. Sampson expressed his appreciation to the SWBT Product Manager for providing the Committee with the information. He asked if any other companies had additional information they wished to share.

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Issue 1286 Status History (Page 10) Conference Call (January 14, 1997)

Additional Discussion (con't.)

The NYNEX representative indicated that because there was a stay by the FCC, they do not plan to offer discounts. He indicated that NYNEX was still working on their approach. He advised that at one point they had considered billing full access on interstate calls and charging local switching to both the

Local Switching Provider and the IXC. This position has since changed, and as of 12/30 NYNEX will no longer be allowed to bill in this way. A SWBT representative indicated that initially, they planned to

bill all elements (as usual) to the Interexchange Carrier and was not billing access to the LSP. However, upon reevaluation of the intent of the Order, they also had to rethink their approach, and somewhat shift their cost recovery. While the method to deliver the call to the end office is not changing, the application of the switching function is. One representative observed that the issues are very complex and questioned if diagrams would help the group understand the issue.

Rodney Sampson observed that the diagrams developed during OBF #56 may have been at too high a level to allow sufficient understanding of the issue. He suggested the Committee may be better served if these diagrams were revisited to add more specificity (with additional discussion of monthly versus usage sensitive elements, at a lower level of detail). To this end, Mr. Sampson indicated he would try to contact the individuals who developed the diagrams during OBF #56 in an attempt to reconvene the group. In the mean time, Mr. Sampson suggested that Committee representatives send their scenarios to the OBF Administrator by January 24.

One representative questioned if the tandem switching elements would be part of this discussion. One provider indicated that while a tandem may be involved, there would be no real tandem switching charges involved. Another provider agreed, and expressed her belief that tandem switching was not part of the local switching since dial tone could not be offered from a tandem.